

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

APR 03 2019

UNITED STATES OF AMERICA

v.

JEREMY OKIETH KYLE
a/k/a COREY WEBSTER
a/k/a RICK

§
§
§
§
§
§

BY
DEPUTY _____

NO. 6:19-CR-18

JUDGE Kernodle - Mitchell

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT 1

Violation: 18 U.S.C. §§ 2422(b)
and 2426
(Coercion and Enticement)

On or about October 6, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce any individual, namely Minor Victim 1, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. §§ 2422(b) and 2426.

COUNT 2

Violation: 18 U.S.C. §§ 2251(a)
and 2251(e)
(Sexual Exploitation of Children)

On or about October 6, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely Minor Victim 1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce and the visual depiction was transported in and affecting interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

COUNT 3

Violation: 18 U.S.C. §§ 2422(b)
and 2426
(Coercion and Enticement)

On or about October 13, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce any individual, namely Minor Victim 1, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. §§ 2422(b) and 2426.

COUNT 4

Violation: 18 U.S.C. §§ 2251(a)
and 2251(e)
(Sexual Exploitation of Children)

On or about October 13, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely Minor Victim 1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce and the visual depiction was transported in and affecting interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

COUNT 5

Violation: 18 U.S.C. §§ 2422(b)
and 2426
(Coercion and Enticement)

On or about October 9, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce any individual, namely Minor Victim 2, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. §§ 2422(b) and 2426.

COUNT 6

Violation: 18 U.S.C. §§ 2422(b)
and 3559(e)
(Coercion and Enticement)

Beginning on or about October 28, 2018 and continuing until on or about October 31, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce any individual, namely Minor Victim 3, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a), and Travel with Intent to Engage in Illicit Sexual Conduct, in violation of 18 U.S.C. § 2423(b).

All in violation of 18 U.S.C. §§ 2422(b) and 3559(e).

COUNT 7

Violation: 18 U.S.C. §§ 2423(b)
and 3559(e)
(Travel with Intent to Engage in
Illicit Sexual Conduct)

On or about October 31, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, did knowingly travel in interstate commerce for the purpose of engaging in in any illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person, namely Minor Victim 3.

All in violation of 18 U.S.C. §§ 2423(b) and 3559(e).

COUNT 8

Violation: 18 U.S.C. §§ 2251(a),
2251(e), and 3559(e)
(Sexual Exploitation of Children)

On or about October 31, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely Minor Victim 3, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce and the visual depiction was transported in and affecting interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 2251(a), 2251(e), and 3559(e).

COUNT 9

Violation: 18 U.S.C. §§ 2422(b)
and 3559(e)
(Coercion and Enticement)

Beginning on or about July 10, 2018 and continuing until on or about July 11, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce any individual, namely Minor Victim 4, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a), and Travel with Intent to Engage in Illicit Sexual Conduct, in violation of 18 U.S.C. § 2423(b).

All in violation of 18 U.S.C. §§ 2422(b) and 3559(e).

COUNT 10

Violation: 18 U.S.C. §§ 2423(b)
and 3559(e)
(Travel with Intent to Engage in
Illicit Sexual Conduct)

On or about July 11, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, did knowingly travel in interstate commerce for the purpose of engaging in in any illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person, namely Minor Victim 4.

All in violation of 18 U.S.C. §§ 2423(b) and 3559(e).

COUNT 11

Violation: 18 U.S.C. §§ 2251(a),
2251(e), and 3559(e)
(Sexual Exploitation of Children)

On or about July 11, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely Minor Victim 4, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce and the visual depiction was transported in and affecting interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 2251(a), 2251(e), and 3559(e).

COUNT 12

Violation: 18 U.S.C. §§ 2422(b)
and 3559(e)
(Coercion and Enticement)

Beginning on or about July 23, 2018 and continuing until on or about July 24, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce any individual, namely Minor Victim 4, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a), and Travel with Intent to Engage in Illicit Sexual Conduct, in violation of 18 U.S.C. § 2423(b).

All in violation of 18 U.S.C. §§ 2422(b) and 3559(e).

COUNT 13

Violation: 18 U.S.C. §§ 2423(b)
and 3559(e)
(Travel with Intent to Engage in
Illicit Sexual Conduct)

On or about July 24, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, did knowingly travel in interstate commerce for the purpose of engaging in in any illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person, namely Minor Victim 4.

All in violation of 18 U.S.C. §§ 2423(b) and 3559(e).

COUNT 14

Violation: 18 U.S.C. §§ 2422(b)
and 3559(e)
(Coercion and Enticement)

On or about January 7, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual, namely Minor Victim 5, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. §§ 2422(b) and 3559(e).

COUNT 15

Violation: 18 U.S.C. §§ 2422(b)
and 3559(e)
(Coercion and Enticement)

On or about April 19, 2016, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual, namely Minor Victim 6, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. §§ 2422(b) and 3559(e).

COUNT 16

Violation: 18 U.S.C. § 2260A
(Penalties for Registered Sex
Offenders)

On or about April 19, 2016, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, an individual required by federal or other law to register as a sex offender, committed a felony offense involving a minor under 18 U.S.C. § 2422, as alleged in Count Fifteen of this indictment.

All in violation of 18 U.S.C. § 2260A.

COUNT 17

Violation: 18 U.S.C. §§ 2422(b)
and 3559(e)
(Coercion and Enticement)

Beginning on or about July 6, 2018 and continuing until on or about July 9, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual, namely Minor Victim 7, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense.

All in violation of 18 U.S.C. §§ 2422(b) and 3559(e).

COUNT 18

Violation: 18 U.S.C. §§ 2422(b)
and 2426
(Coercion and Enticement)

On or about June 26, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual, namely Minor Victim 8, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. §§ 2422(b) and 2426.

COUNT 19

Violation: 18 U.S.C. §§ 2422(b)
and 3559(e)
(Coercion and Enticement)

On or about September 24, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual, namely Minor Victim 9, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. §§ 2422(b) and 3559(e).

COUNT 20

Violation: 18 U.S.C. §§ 2422(b)
and 2426
(Coercion and Enticement)

On or about January 14, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, used a facility of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce and to knowingly attempt to persuade, induce, entice, and coerce any individual, namely Minor Victim 10, who had not attained the age of 18 years to engage in prostitution and any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. §§ 2422(b) and 2426.

COUNT 21

Violation: 18 U.S.C. §§ 2251(a)
and 2251(e)
(Sexual Exploitation of Children)

On or about January 14, 2018, in the Eastern District of Texas, and elsewhere, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely Minor Victim 10, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce and the visual depiction was transported in and affecting interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. §§ 2253 and 2428

1. The allegations contained in Counts 1 through 21 of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §§ 2253 and 2428.

2. Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. § 2251, the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, shall forfeit to the United States of America:

- a. Any visual depiction described in 18 U.S.C. § 2251, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

3. Pursuant to 18 U.S.C. § 2428, upon conviction of an offense in violation of 18 U.S.C. §§ 2422(b) or 2423(b), the defendant, **Jeremy OKieth Kyle a/k/a Corey Webster a/k/a Rick**, shall forfeit to the United States of America:

- a. Any property, real or personal, used or intended to be used to

commit or to facilitate the commission of the offense; and

- b. Any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

- 4. The property to be forfeited includes, but is not limited to, the following:

A Motorola, model XT1767, cellular telephone, bearing IMEI 354136090651500.

- 5. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 2253(b).

- 6. By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. §§ 2253 and 2428.

All pursuant to 18 U.S.C. §§ 2253 and 2428 and the procedures set forth at 21 U.S.C. § 853 and 18 U.S.C. § 981, as made applicable through 18 U.S.C. §§ 2253(b) and 2428, respectively.

A TRUE BILL

AF
GRAND JURY FOREPERSON

4/3/2019
Date

JOSEPH D. BROWN
UNITED STATES ATTORNEY



NATHANIEL C. KUMMERFELD
ASSISTANT UNITED STATES ATTORNEY

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 6:19-CR- <u>18</u>
	§	JUDGE _____
JEREMY OKIETH KYLE	§	
a/k/a COREY WEBSTER	§	
a/k/a RICK	§	

NOTICE OF PENALTY

COUNTS 1, 3, 5-6, 9, 12, 14-15, and 17-20

VIOLATION: 18 U.S.C. §§ 2422(b), 2426, and 3559(e)
Coercion and Enticement

PENALTY: Imprisonment for not less than ten (10) years nor more than life; and if the defendant has a prior sex conviction under this chapter, chapter 109A, chapter 110, or section 1591, or under the State law for an offense consisting of conduct that would have been an offense under this chapter, chapter 109A, chapter 110, or section 1591 if the conduct had occurred within the special maritime and territorial jurisdiction of the United States, the maximum term of imprisonment for such person shall be twice the term of imprisonment otherwise provided by this chapter; and if the defendant is convicted of a Federal sex offense in which a minor is the victim and the defendant has a prior sex conviction in which a minor was the victim, such person shall be imprisoned for life; a fine of \$250,000 to be followed by a term of supervised release of not less than five (5) years to life.

SPECIAL ASSESSMENT: \$100.00 for each count pursuant to 18 U.S.C. § 3013 and \$5,000 for each count pursuant to the Justice for Victims of Trafficking Act of 2015, 18 U.S.C. § 3014(a).

COUNTS 2, 4, 8, 11, and 21

VIOLATION: 18 U.S.C. §§ 2251(a), 2251(e), and 3559(e)
Sexual Exploitation of Children

PENALTY: Imprisonment for not less than fifteen (15) years nor more than thirty (30) years; and if the defendant has one prior conviction under this chapter, section 1591, chapter 71, chapter 109A, or chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, abusive sexual contact involving a minor or ward, or sex trafficking of children, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, such person shall be imprisoned for not less than 25 years nor more than 50 years, but if such person has 2 or more prior convictions under this chapter, chapter 71, chapter 109A, or chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to the sexual exploitation of children, such person shall be imprisoned for not less than 35 years nor more than life; and if the defendant is convicted of a Federal sex offense in which a minor is the victim and the defendant has a prior sex conviction in which a minor was the victim, such person shall be imprisoned for life; a fine not to exceed \$250,000; or both such imprisonment and fine; and a term of supervised release of not less than five (5) years to life.

SPECIAL ASSESSMENT: \$100.00 for each count pursuant to 18 U.S.C. § 3013 and \$5,000 for each count pursuant to the Justice for Victims of Trafficking Act of 2015, 18 U.S.C. § 3014(a).

COUNTS 7, 10, and 13

VIOLATION: 18 U.S.C. §§ 2423(b), 2426, and 3559(e)
Travel with Intent to Engage in Illicit Sexual Conduct

PENALTY: Imprisonment for not more than thirty (30) years; and if the defendant has a prior sex conviction under this chapter, chapter 109A, chapter 110, or section 1591, or under the State

law for an offense consisting of conduct that would have been an offense under this chapter, chapter 109A, chapter 110, or section 1591 if the conduct had occurred within the special maritime and territorial jurisdiction of the United States, the maximum term of imprisonment for such person shall be twice the term of imprisonment otherwise provided by this chapter; and if the defendant is convicted of a Federal sex offense in which a minor is the victim and the defendant has a prior sex conviction in which a minor was the victim, such person shall be imprisoned for life; a fine of \$250,000 to be followed by a term of supervised release of not less than five (5) years to life.

SPECIAL ASSESSMENT: \$100.00 for each count pursuant to 18 U.S.C. § 3013 and \$5,000 for each count pursuant to the Justice for Victims of Trafficking Act of 2015, 18 U.S.C. § 3014(a).

COUNT 16

VIOLATION: 18 U.S.C. § 2260A
Penalties for Registered Sex Offenders

PENALTY: Mandatory imprisonment of ten (10) years in addition to the imprisonment imposed for the felony offense involving a minor. This punishment shall be consecutive to any sentence imposed for that felony offense. Additional penalties include a fine of \$250,000 to be followed by a term of supervised release of not less than five (5) years to life.

SPECIAL ASSESSMENT: \$100.00 pursuant to 18 U.S.C. § 3013 and \$5,000 pursuant to the Justice for Victims of Trafficking Act of 2015, 18 U.S.C. § 3014(a).